

WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP

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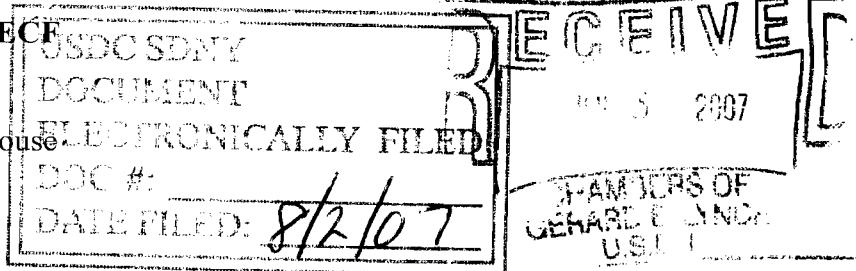
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July 30, 2007

By Overnight Courier and ECF

Hon. Gerald E. Lynch
United States District Courthouse
500 Pearl Street, Room 910
New York, New York 10007



RE: American General Life Insurance Company v. The Costantino
Presta Irrevocable Trust; Mark Seelig, Eugenio Presta, and Nicola
Presta, as Trustees of the Costantino Presta Irrevocable Trust; and
HSBC Bank USA, National Association.
No.: 07 CIV. 3136

Dear Judge Lynch:

We represent plaintiff American General Life Insurance Company ("American General") in the captioned declaratory judgment action. We write to request an extension of time to conduct conferences pursuant to Federal Rules of Civil Procedure 26(f) and 16(c).

* [By way of summary, on April 19, 2007, American General filed a Complaint in the United States District Court for the Southern District of New York. On April 23, 2007, American General served all defendants with the Complaint. On June 25, 2007, defendant HSBC Bank USA, National Association ("HSBC") interposed an Answer. The Costantino Presta Irrevocable Trust and Mark Seelig, Eugenio Presta, and Nicola Presta, as Trustees of the Costantino Presta Irrevocable Trust (collectively, the "Trust defendants") have requested an extension of time until August 15, 2007 to interpose an Answer. The Trust defendants require additional time to explore with counsel whether it is in their best interest to oppose this action.

Accordingly, it is respectfully requested that the court delay Rule 26(f) and 16(c) conferences in this matter until after August 15, 2007, to allow the Trust defendants additional time to Answer. This is the first request for an extension of time and all of the parties consent to this request.

Thank you for your attention to this matter.

Very truly yours,
WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP

s/Michelle M. Arbitrio
Michelle M. Arbitrio (MA 2137)

*SO ORDERED
Gerard E. Lynch
GERARD E. LYNCH, U.S.D.J.

7/31/07

cc: by Overnight Courier:

Mitch Schuster
Meister, Seelig & Fein LLP
Attorneys for Defendants
140 East 45th Street – 19th Floor
New York, NY 10017

AFFIDAVIT OF SERVICE

STATE OF NEW YORK)
)SS :
COUNTY OF WESTCHESTER)

UNDINE MASSIAH, being duly sworn, deposes and says: deponent is not a party to the action, is over 18 years of age and resides in Brooklyn, New York.

On the 30th day of July, 2007, deponent served the within

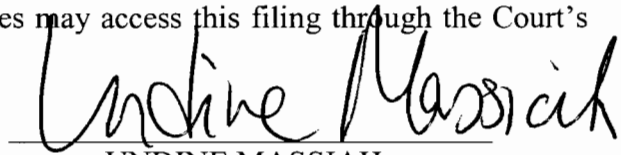
**LETTER re: REQUEST FOR EXTENSION OF TIME TO
CONDUCT CONFERENCES PURSUANT TO FEDERAL
RULES OF CIVIL PROCEDURE 26(f) and 16(c)**

Upon:

Hon. Gerakd E. Lynch
United States District Courthouse
500 Pearl Street, Room 910
New York, New York 10007

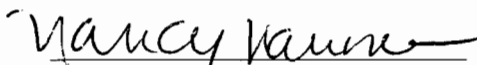
Mitch Schuster
Meister Seelig & Fein LLP
140 East 45th Street – 19th Floor
New York, NY 10017

a copy of the foregoing which was filed electronically and served by **Federal Express Priority Overnight (Next Business Morning) Overnight** wrapper, in an official depository under the exclusive care and custody of Federal Express within the State of New York on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system and by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.



UNDINE MASSIAH

Sworn to before me this
30th day of July, 2007



Notary Public

NANCY NAUMAN
Notary Public, State of New York
No. 4930293
Qualified in Westchester County
Commission Expires May 9, 2010